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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PEÑA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals,

Plaintiffs,

v.

THE GEO GROUP, Inc., a Florida
corporation; the CITY OF
ADELANTO, a municipal entity; GEO
LIEUTENANT DIAZ, sued in her
individual capacity; GEO
SERGEANT CAMPOS, sued in his
individual capacity; SARAH JONES,
sued in her individual capacity; THE
UNITED STATES OF AMERICA;
CORRECT CARE SOLUTIONS,
INC.; and DOES 1-10, individuals,

Defendants.

Case No. 5:18-cv-01125-SP

**PLAINTIFFS' NOTICE OF
MOTION AND UNOPPOSED
MOTION REQUESTING LETTERS
IN SUPPORT OF PLAINTIFFS'
VISA APPLICATIONS FOR TRIAL**

HEARING:

Date: December 10, 2019

Time: 10:00 a.m.

Ctrm: 3

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1 **TO THIS HONORABLE COURT AND ALL PARTIES OF RECORD,**
2 **PLEASE TAKE NOTICE** that Plaintiffs Omar Arnaldo Rivera Martinez and Isaac
3 Antonio Lopez Castillo respectfully move to request a letter from the Honorable
4 Sheri Pym in support of Plaintiffs' visa applications for trial-related travel in the
5 United States. This motion is based upon the United States Department of State
6 requirements for foreign nationals traveling to the United States to conduct
7 temporary business, including litigation. *See* U.S. Dep't of State, Foreign Affairs
8 Manual (FAM), 9 FAM 402.2-5(B)(U)(4).

9 The hearing on this motion will take place on Tuesday, December 10, 2019 at
10 10:00 a.m. at 3470 12th St., Riverside, CA 92501, Courtroom 3, 3rd Floor, or at
11 another date and time ordered by the Court.

12 This motion is made following the meet and confer of counsel in accordance
13 with L.R. 7-3 which took place on October 31, 2019. Defendants do not oppose this
14 motion.

15
16 DATED: November 4, 2019 Respectfully submitted,

17 LAW OFFICE OF RACHEL STEINBACK
18 LAW OFFICE OF CAROL A. SOBEL
19 SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
20 LAW OFFICE OF COLLEEN FLYNN
21 LAW OFFICE OF MATTHEW STRUGAR

22 By: /s/ Monique Alarcon
23 Attorneys for Plaintiffs
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**PLAINTIFFS' UNOPPOSED MOTION REQUESTING LETTERS IN
SUPPORT OF PLAINTIFFS' VISA APPLICATIONS FOR TRIAL**

Plaintiffs are eight asylum seeking refugees from El Salvador and Honduras who were placed in United States Immigration and Customs Enforcement ("ICE") custody at Adelanto ICE Processing Center during the incident giving rise to this action. Presently, all Plaintiffs are out of ICE custody and six of the eight Plaintiffs reside within the United States. Plaintiffs Omar Arnoldo Rivera Martinez and Isaac Antonio Lopez Castillo no longer reside in the United States.

Plaintiff Lopez Castillo was granted asylum by the Mexican government and resides in Tijuana, B.C., Mexico. Plaintiff Rivera Martinez was issued a humanitarian visa by the Mexican government and resides in Tapachula, Chiapas, Mexico.

Trial in this matter is scheduled to begin February 3, 2020. In order to attend and testify at trial in person, Plaintiffs Lopez Castillo and Rivera Martinez must have B-1/B-2 Nonimmigrant Visas in order to enter the United States. *See* U.S. Dep't of State, Foreign Affairs Manual (FAM), 9 FAM 402.2-5(B)(U)(4) (noting B-I visa is appropriate for aliens seeking to enter the United States for litigation purposes). If granted, these B-1/B-2 Nonimmigrant Visas, which are temporary visas for business and tourism, will enable Plaintiffs to enter the United States and participate in this litigation. Although Plaintiffs Rivera Martinez and Lopez Castillo have been deposed in Mexico, visas are still required for attendance at trial. Plaintiffs' counsel will cover all travel expenses and any expenses incurred by Plaintiffs during their visits to the United States for trial.

Attached to this motion as Exhibits A and B, Plaintiffs have provided two letters for the Court's consideration; one for each requesting Plaintiff. Plaintiffs request that the Court submit these letters to the U.S. Consulate General in Tijuana, Mexico (Ex. A) and the U.S. Consular Agency in Oaxaca, Mexico (Ex. B) and provide copies of the signed letters to Plaintiffs' counsel for direct submission to the

1 U.S. Department of State as well. Plaintiffs note that submission of such letters is
2 routine. Attached as Exhibit C is an example of a similar letter sent by a district
3 court judge in the Central District of California.

4 All parties met and conferred on this motion and Defendants do not oppose
5 this request. Accordingly, Plaintiffs respectfully request that this Court submit
6 letters in support of Plaintiffs' visa applications for trial-related travel to the United
7 States.

8 DATED: November 4, 2019 Respectfully submitted,
9

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15 By: /s/ Monique Alarcon
16 Attorneys for Plaintiffs
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